

Precision Spine, et al. v.
Zavation, et al.

Justin Kyle Johnson
January 24, 2017

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

PRECISION SPINE, INC.,
AND SPINAL USA, INC. F/K/A
SPINAL USA, LLC

PLAINTIFFS/COUNTER-DEFENDANTS

V.

CIVIL ACTION NO. 3:15CV681-LG-RHW

ZAVATION, LLC, J2
MANUFACTURING, LLC, AND
JEFFREY JOHNSON

DEFENDANTS/COUNTER-PLAINTIFFS

ORAL DEPOSITION OF JUSTIN KYLE JOHNSON

Taken at the instance of the Plaintiffs/Counter-Defendants
on Tuesday, January 24, 2017, in the offices of
Butler Snow, LLP, 1020 Highland Colony Parkway,
Suite 1400, Ridgeland, Mississippi,
beginning at 9:20 a.m.

(Appearances noted herein)

REPORTED BY:

Kelly D. Brentz, CSR, RPR
Edwards Reporting, Inc.
435 Katherine Drive, Suite A
Jackson, Mississippi 39232
601-355-DEPO (3376)
800-705-DEPO (3376)

EXHIBIT 4

Precision Spine, et al. v.
Zavation, et al.

Justin Kyle Johnson
January 24, 2017

Page 2

APPEARANCES:

JOHN G. CORLEW, ESQ.
Corlew, Munford & Smith
4450 Old Canton Road, Suite 111
Jackson, Mississippi 39211

COUNSEL FOR PLAINTIFFS/COUNTER-DEFENDANTS

JOHN A. CRAWFORD, JR., ESQ.
PAUL A. DAVIS, ESQ.
Butler Snow, LLP
1020 Highland Colony Parkway, Suite 1400
Ridgeland, Mississippi 39157

COUNSEL FOR DEFENDANTS/COUNTER-PLAINTIFFS

ALSO PRESENT: Frankie Cummins
Lawrence Walker (telephonically)

Precision Spine, et al. v.
Zavation, et al.

Justin Kyle Johnson
January 24, 2017

Page 24

1 production.

2 (Exhibit 253 marked for identification and
3 attached hereto.)

4 MR. CORLEW: And I'm going to mark as Exhibit
5 254 two pages that relate to the Monday production.
6 There was some confusion about the documents, if you
7 remember, so I think we need to put those two
8 together.

9 (Exhibit 254 marked for identification and
10 attached hereto.)

11 Q. (By Mr. Corlew) Now, when you were retained at
12 Spinal, did you sign a confidentiality agreement?

13 MR. CRAWFORD: Object to the form.

14 A. I did not.

15 Q. (By Mr. Corlew) Let me hand you this document
16 and ask if you can identify it?

17 (Pause.)

18 A. I identify my signature on here, that is
19 correct.

20 Q. Dated August 25, 2008?

21 MR. CRAWFORD: Object to the form.

22 Q. (By Mr. Corlew) Look at the first paragraph.
23 Is the date of it August 25, 2008?

24 A. That is the date I was hired, but that -- I did
25 not sign a confidentiality agreement on that date.

Precision Spine, et al. v.
Zavation, et al.

Justin Kyle Johnson
January 24, 2017

Page 25

1 Q. When did you sign a confidentiality agreement?

2 A. I do not remember the date. Also, I did not
3 work for Spinal USA. That was never an entity that I
4 worked for.

5 Q. What entity did you work for?

6 A. Precision Medical of Mississippi.

7 Q. And what was the relationship between Precision
8 Medical of Mississippi and Spinal USA?

9 A. Precision Medical was the manufacturing
10 division -- was the manufacturing part of -- they were
11 separate entities but Precision Medical did the
12 manufacturing.

13 Q. Who owned Precision Medical?

14 MR. CRAWFORD: At what time?

15 Q. (By Mr. Corlew) When you hired in?

16 A. A group of doctors, I assumed, owned it, yeah.

17 Q. Was it owned by Spinal USA?

18 MR. CRAWFORD: Object to the form.

19 A. I do not know if it was owned by Spinal USA.

20 Q. (By Mr. Corlew) Who wrote your checks?

21 A. Precision Medical of Mississippi.

22 Q. And on the products that were manufactured, what
23 were they called?

24 A. What were the products called?

25 Q. Uh-huh.